

## **REMARKS**

This is in response to the Office Action dated September 22, 2005. In view of the foregoing amendments and following representations, reconsideration is respectfully requested.

By the above amendment, claims 1 and 5-8 are cancelled; claims 2 and 4 are amended; and claim 9-15 are newly added. Accordingly, claims 2-4 and 9-15 are currently pending in the present application.

Initially, on page 2 of the Office Action, the disclosure is objected to based on a number of minor informalities. Accordingly, the specification has been revised in order to correct a number of informalities including the informalities noted by the Examiner. Due to the nature of the revision involved, a substitute specification and abstract has been prepared. No new matter has been added. Also enclosed is a "marked-up" copy of the original specification and abstract to show the changes that have been incorporated into the substitute specification and abstract. The enclosed copy is entitled "Version with Markings to Show Changes Made."

In view of the presentation of the substitute specification, it is submitted that the objections to the specification are now clearly obviated.

Next, on page 2 of the Office Action, claims 7 and 8 are rejected under 35 U.S.C. § 112, second paragraph. However, claims 7 and 8 are now cancelled, thereby rendering moot the rejection of these claims under 35 U.S.C. § 112, second paragraph.

Next, on pages 3-4 of the Office Action, claims 1-6 are rejected over the prior art as follows:

*Claims 1-4 are rejected under 35 U.S.C. 102(b) as being anticipated by Randolph, Sr. (U.S. Patent No. 3,942,354);*

*Claim 5 is also rejected under 35 U.S.C. 102(b) as being anticipated by Randolph; and*

*Claim 6 is also rejected under 35 U.S.C. 102(b) as being anticipated by Randolph.*

It is submitted that the present invention, as defined in the new claims, now clearly distinguishes over the Randolph reference for the following reasons.

Randolph discloses a die unit including a carrier plate 78 including studs 82 which are each surrounded by a sleeve 98 that projects through plate 79 to abut, at one end thereof, the carrier plate 78 and at the other end, plate 88. As shown in Fig. 1, coil-type compression springs 100 are disposed around the sleeves 98 and are contained between plates 88 and 79. A plate 106 is provided with a series of apertures 124 which define guide passages for receiving therein pressure pins 126. The lower ends of the pressure pins 126 are seated in a free bearing relation on the upper surface of plate 79, and the upper ends of the pins 126 are fixedly connected to the body of a pressure plate 128.

Further, the springs 100 maintain a bias on the pins 126. Also, as described in col. 6, lines 59-64 of the Randolph patent, due to the balanced nature of the bias supplied to the pins 126 through the plate 79 during a blanking operation, the plate 128 will maintain the work in a flat condition and against the working face of a tool 48. However, in Randolph, the cushion pins 126 are not provided with an elastic member as required in

new claim 9. Also, in Randolph, the springs 100 is not coaxial with respect to a pillar member of the cushion pins 126.

In contrast, as defined in new claim 9, the elastic member 6 is required to be arranged in a coaxial manner with respect to a pillar member of the cushion pin 1. In view of the above, it is apparent that the Randolph reference does not disclose each and every limitation of claim 9, and therefore cannot anticipate claim 9 under 35 U.S.C. 102(b).

Further, with regard to method claim 4, the Randolph device clearly does not perform the "equalization" function required in claim 4 with a cushion pad provided with cushion pins each of which are provided with an elastic member.

With respect to new claim 13, which corresponds to original claims 5 and 6, it is submitted that the load supporting device of Randolph is not interposed between a cushion pin and a die cushion pad. Note that, new claim 13 requires that the load supporting device is interposed between the cushion pin and the die cushion pad.

Further, as discussed above, the springs 100 of Randolph are not arranged coaxially with the cushion pins 126. However, claim 13 requires that the elastic member is arranged coaxially with respect to the cushion pin. Therefore, it is submitted that claim 13 is clearly allowable over the Randolph patent.

Further, claim 14 is directed to the subject matter recited in original claim 7 and shown, for example, in Fig. 9. The claimed die cushion includes a plurality of load supporting devices disposed on a die cushion pad, and each of the load supporting devices has an elastic member that is provided coaxially with respect an associated cushion pin. Clearly this arrangement is not disclosed or remotely suggested in the Randolph patent.

In view of the above, it is submitted that the present application is now clearly in condition for allowance. The Examiner therefore is requested to pass this case to issue.

In the event that the Examiner has any comments or suggestions of a nature necessary to place this case in condition for allowance, then the Examiner is requested to contact Applicant's undersigned attorney by telephone to promptly resolve any remaining matters.

Respectfully submitted,

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